Case3:15-cv-01286-EMC Document23 Filed07/21/15 Page1 of 3

1 2 3 4 5 6 7 8 9 10	PAUL HASTINGS LLP M. KIRBY C. WILCOX (SB# 078576) kirbywilcox@paulhastings.com ZACHARY P. HUTTON (SB# 234737) zachhutton@paulhastings.com RYAN C. HESS (SB# 263079) ryanhess@paulhastings.com 55 Second Street Twenty-Fourth Floor San Francisco, CA 94105-3441 Telephone: 1(415) 856-7000 Facsimile: 1(415) 856-7100 PAUL HASTINGS LLP ESTHER Y. CHENG (SB# 280547) esthercheng@paulhastings.com 875 15th Street, N.W. Washington, DC 20005 Telephone: 1(202) 551-1700 Facsimile: 1(202) 551-1705 Attorneys for Defendant Homejoy, Inc.		
13			
14	UNITED STATES DISTRICT COURT		
	NORTHERN DISTRICT OF CALIFORNIA		
15	NORTHERN DISTR	ICI OF CALIFORN	NIA
16			
17	J.C. IGLESIAS, individually and on behalf of all others similarly situated,	CASE NO. 15-CV	-1286-EMC
18	Plaintiff,		AND [PROPOSED]
19	,		THDRAWAL OF PAUL AS COUNSEL FOR
20	VS.	DEFENDANT HO	
21	HOMEJOY, INC.,	CIVIL LOCAL R	RULES 7-12 & 11-5
22	Defendant.	Judge:	Hon, Edward M. Chen,
23		Department: Complaint Filed:	5 March 19, 2015
24		Trial Date:	None set
25			
26			
27			
28			

Case No. 15-cv-1286-EMC

STIPULATION AND [PROPOSED] ORDER FOR WITHDRAWAL OF PAUL HASTINGS LLP AS COUNSEL FOR DEFENDANT HOMEJOY, INC.

1

STIPULATION

2

4

56

7

8

9

11

1213

14

15

16

1718

19

20

21

2223

24

2526

27

Defendant Homejoy, Inc. ("Homejoy"), and the law firm of Paul Hastings LLP ("Paul Hastings") hereby stipulate as follows:

Whereas, Paul Hastings has represented Homejoy in this action;

Whereas, Homejoy now knowingly and freely assents to Paul Hastings' withdrawal from the action, and withdrawal is permissible under Rule 3-700(C) of the California Rules of Professional Conduct;

Whereas, Paul Hastings has taken reasonable steps to avoid reasonably foreseeable prejudice to the rights of Homejoy pursuant to Rule 3-700(A)(2) of the California Rules of Professional Conduct, including giving due notice to Homejoy and allowing time for search of new counsel;

Whereas, Homejoy and Paul Hastings acknowledge that papers may continue to be served on Paul Hastings for forwarding purposes, unless and until Homejoy appears by other counsel;

Whereas, Paul Hastings will promptly and fully comply with Rule 3-700(D) of the California Rules of Professional Conduct and cooperate with successor counsel to ensure a smooth transition and to avoid any prejudice to Homejoy;

Whereas, Paul Hastings has also represented Homejoy in three pending California state court actions, *Zenelaj, et al. v. Homejoy, Inc.*, Case No. CGC-15-544599 (San Francisco Superior Court); *Ventura, et al. v. Homejoy, Inc.*, Case No. CGC-15-544750 (San Francisco Superior Court); and *Malveaux-Smith, et al. v. Homejoy, Inc.*, Case No. 37-2015-00005070-CU-OE-CTL (San Diego Superior Court); and on July 15, 2015, Paul Hastings filed an *Ex Parte* Application to Withdraw from Representation of Defendant Homejoy, Inc., or in the Alternative, to Shorten Time to Hear Motion to Withdraw ("*Ex Parte* Application") in all three cases;

Whereas, on July 16, 2015, all three *Ex Parte* Applications were heard, and the San Francisco Superior Court granted Paul Hastings' motions to withdraw in *Zenelaj* and *Ventura*, and the San Diego Superior Court scheduled the motion to withdraw hearing for August 7, 2015, in *Malveaux-Smith*;

1	Whereas, all parties to this action are notified of this withdrawal through the electronic		
2	filing of this stipulation and proposed order;		
3	IT IS THEREFORE STIPULATED, pursuant to Rules 7-12 and 11-5 of the Civil Local		
4	Rules of the United States District Court for the Northern District of California, that Paul		
5	Hastings may and hereby does withdraw as counsel for Homejoy in this action.		
6	DATED: July <u>d</u> /, 2015		
7	DATED: July <u>√ (,</u> 2015	Respectfully submitted,	
8	·	PAUL HASTINGS LLP	
9		7/1/1/2	
10	•	By: ZACHARY P. HUTTON	
11		Attorneys for Defendant	
12	DATED: July <u>21,</u> 2015	Homejoy, Inc.	
13	DATED. July <u>21,</u> 2015	Respectfully submitted, HOMEJOY, INC.	
14		HOMEJOI, INC.	
15		By:	
16		ADORA CHEUNG	
17		CEO, Homejoy, Inc.	
18			
19		[PROPOSED] ORDER	
20			
21	PURSUANT TO STIPULATION, IT IS SO ORDERED		
22		TION, IT IS SO ORDERED	
23			
24	DATED: <u>July 27, 2015</u> . Granted in light	CRANTED	
25	Homejoy's filing	at Docket	
26	No. 27.	Judge Edward M. Chen	
27		Judge of States District Court	
20 1		Julia States District Court	
28		STIPUL TO KANDIPROPOSED ORDER FOR	